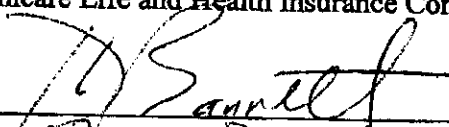


The parties propose that the claimant file a motion for summary judgment under F.R.C.P.56 on or before July 15, 2004, that it not contain a detailed statement of facts as such a statement is not necessary and that the stakeholder file a response, if it chooses to do so, on or before July 29, 2004. The parties anticipate that the motion be decided on the documents submitted on such timetable as this court determines. Unicare reserves the right to seek reimbursement for its legal fees and expenses associated with Interpleading the death benefit at issue in this litigation. To the event the parties do not reach agreement on this issue, Unicare may file a motion seeking recovery of its attorney's fees and costs on or before July 15, 2004.

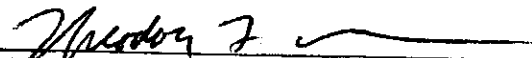
2A. Certification Regarding Costs And Alternate Dispute Resolution

We hereby certify that we have conferred with a view to establishing a budget for the costs of conducting the full course—and various alternative courses— of the litigation; and that we have considered the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Unicare Life and Health Insurance Company,


By: Theresa Barretta
Its: Counsel

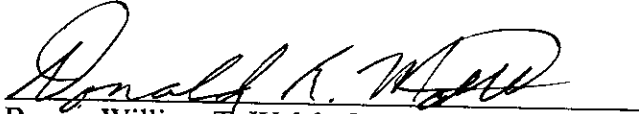
Counsel to, Unicare Life and Health Insurance Company


Theodore F. Glockner

2B. Certification Regarding Costs And Alternate Dispute Resolution:

We hereby certify that we have conferred with a view to establishing a budget for the costs of conducting the full course and various alternative courses of the litigation; and that we have considered the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

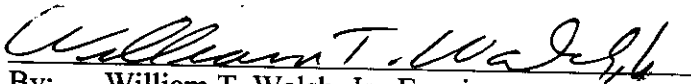
Donald Martel,

A handwritten signature in cursive script, appearing to read "William T. Walsh, Jr.", written over a horizontal line.

By: William T. Walsh, Jr., Esquire

Its:

Counsel to, Donald Martel,

A handwritten signature in cursive script, appearing to read "William T. Walsh, Jr.", written over a horizontal line.

By: William T. Walsh, Jr., Esquire

Its: